

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

NINETY-FIVE MADISON COMPANY, L.P.

Debtor.

Chapter 11

Case No. 21-10529 (DSJ)

**DECLARATION OF JORDAN REISCH IN SUPPORT OF
BRANTON REALTY SERVICES LLC'S PRE-HEARING MEMORANDUM**

Jordan Reisch, Esq. declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am an attorney with the law firm Amini LLC, counsel of record for Branton Realty Services LLC (“Branton”) in this contested matter. I submit this Declaration in support of Branton’s Pre-Hearing Memorandum and, in particular, to place before the Court the exhibits that are described herein and annexed hereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the August 18, 2022 Listing Agreement between Branton and Ninety-Five Madison Company, L.P.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the October 16, 2024 deposition of Michael Sklar.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the October 17, 2024 deposition of Sharan Sklar.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the October 15, 2024 deposition of Emanuel Westfried.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the October 10, 2024 deposition of Lin Zhuo.

7. Attached hereto as **Exhibit 6** is a true and correct copy of an email chain dated August 18, 2022 from Woody Heller to Andrew Glenn, bearing the bates number BR002324 through 25.

8. Attached hereto as **Exhibit 7** is a true and correct copy of an email dated August 18, 2022 from Andrew Glenn to Cobby Gorjian, Jeremy Nazarian, and Woody Heller, bearing the bates number BR002320.

9. Attached hereto as **Exhibit 8** is a true and correct copy of an email chain dated August 31, 2022 from Michael Sklar to Woody Heller and Sharan Sklar, bearing the bates number BR002254 through 57.

10. Attached hereto as **Exhibit 9** is a true and correct copy of an email chain dated September 14, 2022 from Sharan Sklar to Woody Heller and Michael Sklar, bearing the bates number BR002142 through 43.

11. Attached hereto as **Exhibit 10** is a true and correct copy of an email dated October 24, 2022 from Michael Sklar to Harley Dalton, Woody Heller, and Sharan Sklar, bearing the bates number BR002129.

12. Attached hereto as **Exhibit 11** is a true and correct company of an email chain dated October 24, 2022 from Michael Sklar to Woody Heller and Sharan Sklar, bearing the bates number BR002258 through 59.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an email dated November 15, 2022 from Sharan Sklar to Woody Heller and Zach Herring, bearing the bates number BR002295.

14. Attached hereto as **Exhibit 13** is a true and correct copy of an email chain dated November 15, 2022 from Michael Sklar to Woody Heller, Sharan Sklar, Andrew Kahn, and Thomas Flemming, bearing the bates number BR002291 through 92.

15. Attached hereto as **Exhibit 14** is a true and correct copy of an email chain dated December 19, 2022 from Sharan Sklar to Woody Heller, Michael Sklar, and Aaron Lunzer, bearing the bates number BR002147 through 48.

16. Attached hereto as **Exhibit 15** is a true and correct copy of an email dated May 5, 2023 from Sharan Sklar to Woody Heller, Michael Sklar, and Troy Taylor, bearing the bates number BR002141.

17. Attached hereto as **Exhibit 16** is a true and correct copy of an email dated June 27, 2023 from Sharan Sklar to Woody Heller and Michael Sklar, bearing the bates number BR002293.

18. Attached hereto as **Exhibit 17** is a true and correct copy of an email chain dated September 26, 2023 from Michael Sklar to Woody Heller and Sharan Sklar, bearing the bates number BR002145 through 46.

19. Attached hereto as **Exhibit 18** is a true and correct copy of an email chain dated September 22, 2022 from Sharan Sklar to Andrew Glenn, Woody Heller, and Michael Sklar, bearing the bates number BR002144.

20. Attached hereto as **Exhibit 19** is a true and correct copy of an email chain dated January 25, 2023 from Sharan Sklar to Woody Heller, Michael Sklar, Sharan Sklar, Rita Sklar, Andrew Glenn, and Thomas Flemming, bearing the bates number BR002261 through 62.

21. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts of Michael Sklar's phone records, produced by Verizon, bearing the bates numbers Verizon000006, Verizon000022, Verizon000027, Verizon000028, Verizon000033, Verizon000034, Verizon000038, Verizon000039, Verizon000042, and Verizon000044.

22. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts of Emanuel Westfried's phone records, produced by Verizon, bearing the bates numbers Verizon000056, Verizon000157, Verizon000175.

23. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts of text messages between Michael Sklar and Emanuel Westfried, dated November 6, 2023 through January 2, 2024, bearing the bates number NFMC_000044 through 45.

24. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts of text messages between Emanuel Westfried, Michael Sklar, and Sharan Sklar, dated December 27, 2023 through April 30, 2024, bearing the bates number TB_EW_003190.

25. Attached hereto as **Exhibit 24** is a true and correct copy of an email dated January 1, 2024 from Michael Sklar to Emanuel Westfried, bearing the bates number NFMC_000582.

26. Attached hereto as **Exhibit 25** is a true and correct copy of an email chain dated January 1, 2024 from Emanuel Westfried to Lin Zhuo and Jimmy Chou, bearing the bates number TB_EW_000013.

27. Attached hereto as **Exhibit 26** is a true and correct copy of an email chain dated January 2, 2024 from Emanuel Westfried to Michael Sklar, bearing the bates number NFMC_000583 through 87.

28. Attached hereto as **Exhibit 27** is a true and correct copy of an email chain dated January 8, 2024 from Emanuel Westfried to Michael Sklar, bearing the bates number NFMC_000612, attaching documents bearing bates number NFMC_000613 through 30.

29. Attached hereto as **Exhibit 28** is a true and correct copy of an email dated January 9, 2024 from Michael Sklar to Woody Heller, Michael Lefkowitz, Andrew Glenn, and Sharan Sklar, bearing the bates number BR001226, attaching a document bearing the bates number BR001227 through 31.

30. Attached hereto as **Exhibit 29** is a true and correct copy of an email chain dated January 23, 2024 from Michael Lefkowitz to Michael Sklar, Sharan Sklar, Andrew Glenn, Woody Heller, and Corey Rashkover, bearing the bates number BR000876.

31. Attached hereto as **Exhibit 30** is a true and correct copy of an email chain dated January 9, 2024 from Emanuel Westfried to Michael Sklar, bearing the bates number NPMC_000650 through 51.

32. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts of text messages between Emanuel Westfried and Lin Zhuo, dated January 8, 2024 through January 10, 2024, bearing the bates number S00308-310.

33. Attached hereto as **Exhibit 32** is a true and correct copy of an email chain dated January 12, 2024 from Emanuel Westfried to Michael Sklar, bearing the bates number NPMC_000652, attaching a document bearing the bates number NPMC_000653.

34. Attached hereto as **Exhibit 33** is a true and correct copy of excerpts of text messages between Michael Sklar and Emanuel Westfried, dated January 10, 2024 through February 1, 2024, bearing the bates number NPMC_000047 through 48.

35. Attached hereto as **Exhibit 34** is a true and correct copy of an email dated February 1, 2024 from Michael Sklar to Emanuel Westfried, bearing the bates number TB_EW_000199.

36. Attached hereto as **Exhibit 35** is a true and correct copy of an email chain dated April 17, 2024 from Andrew Glenn to Morris Missry, Michael Lefkowitz, Emanuel Westfried, Michael Sklar, Jau Lau, Lin Zhuo, Sharan Sklar, Erick Vallely, Steven Cohen, and brett@getconciergelaw.com, bearing the bates number TB_EW_002798 through 800.

37. Attached hereto as **Exhibit 36** is a true and correct copy of an email dated September 12, 2022 from Michael Sklar to Woody Heller, Sharan Sklar, Rita Sklar, Andrew

Glenn, Thomas Flemming, bearing the bates number NFMC-06612, attaching documents bearing the bates number NFMC-06615 through NFMC-06621.

38. Attached hereto as **Exhibit 37** is a true and correct copy of emails exchanged between Woody Heller and Michael Sklar between June 23, 2023 and June 27, 2023, bearing the bates numbers NFMC-06564 through 55 and NFMC-06632 through 33. .

39. Attached hereto as **Exhibit 38** is a true and correct copy of an email chain dated December 28, 2023 from Michael Sklar to Woody Heller, bearing the bates number BR002420 through 21.

40. Attached hereto as **Exhibit 39** is a true and correct copy of an email dated December 11, 2023 from Michael Sklar to Sharan Sklar, bearing the bates number NFMC-06634.

Executed this 16th day of December 2024 in New York, NY.

/s/ Jordan Reisch
Jordan Reisch